

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FEI GUAN,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:17-cv-332 (JCC/IDD)
BING RAN; ALICE GUAN;)	
ADVANCED SYSTEMS MANAGEMENT))	
AND TECHNOLOGY, INC.; and)	
QI TECH, LLC)	
)	
Defendants.)	
)	

**OPPOSITION TO DEFENDANT ADVANCED SYSTEMS TECHNOLOGY AND
MANAGEMENT, INC.’S MOTION TO DISMISS**

COMES NOW the Plaintiff Fei Guan, through counsel, to oppose the Motion to Dismiss by Defendant Advanced Systems Technology and Management, Inc. (“AdSTM”). Although Plaintiff opposes AdSTM’s motion in full, he intends to file an Amended Complaint that will moot the aforementioned motion. Plaintiff will file his Amended Complaint within the time allowed under Federal Rule of Civil Procedure 15(a)(1)(B). As that Amended Complaint will render Defendant AdSTM’s Motion to Dismiss moot, Plaintiff respectfully requests that Defendant’s motion be denied.

Dated: May 9, 2017

Respectfully,

/s/
Joshua Erlich, VA Bar No. 81298
Davia Craumer, VA Bar No. 87426
Katherine Herrmann, VA Bar No. 83203
THE ERLICH LAW OFFICE, PLLC
2111 Wilson Blvd., Ste. 700
Arlington, VA 22201

Tel: (703) 791-9087
Fax: (703) 722-8114
Email: jerlich@erlichlawoffice.com
dcraumer@erlichlawoffice.com
kherrmann@erlichlawoffice.com

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2017, a true copy of the foregoing was filed electronically with the Clerk of the Court and served electronically using the CM/ECF upon:

James B. Kinsel (VSB No. 44247)
Rebecca Bricken Segal (VSB No. 73403)
PROTORAE LAW, PLLC
1921 Gallows Road, Suite 950
Tysons, VA, 22182
jkinsel@protoraelaw.com
rsegal@protoraelaw.com

*Counsel for Defendant Advanced Systems
Technology & Management, Inc.*

Mihir V. Elchuri (VSB No. 86582)
HIRSCHLER FLEISHER,
A PROFESSIONAL CORPORATION
8270 Greensboro Drive, Suite 700
Tysons, VA 22102
melchuri@hf-law.com

Counsel for Defendant Qi Tech, LLC

William B. Cummings, Esq. (VSB No. 6469)
William B. Cummings, P.C.
Post Office Box 1177
Alexandria, VA 22313
wbcplaw@aol.com

Counsel for Bing Ran

A copy of this filing has also been sent by U.S. mail to Alice Guan, a *pro se* defendant, at: 4250 Alafaya Trail, #212 – 163, Oviedo, FL 32765.

/s/
Joshua Erlich, VA Bar No. 81298
Davia Craumer, VA Bar No. 87426
Katherine Herrmann, VA Bar No. 83203
The Erlich Law Office, PLLC
2111 Wilson Blvd.
Suite 700
Arlington, VA 22201

Tel: (703) 791-9087
Fax: (703) 351-9292
Email: jerlich@erlichlawoffice.com
dcraumer@erlichlawoffice.com
kherrmann@erlichlawoffice.com

Counsel for Plaintiff Fei Guan